

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

TERREL HASKINS,

Plaintiff,

-against-

CITY OF NEW YORK, and JOHN and JANE DOE 1
through 10, individually and in their official capacities (the
names John and Jane Doe being fictitious, as the true names
are presently unknown),

Defendants.

**REPLY DECLARATION OF
JOANNE M. McLAREN IN
FURTHER SUPPORT OF
DEFENDANTS' MOTION
FOR SUMMARY
JUDGMENT**

15-CV-02016 (MKB)(RML)

Joanne M. McLaren declares pursuant to 28 U.S.C. § 1746, under penalty of
perjury, that the following is true and correct.

1. I am an attorney in the office of Zachary W. Carter, Corporation Counsel
of the City of New York, representing defendants City of New York (hereinafter "City") and
Clifford Strong, Essence Jackson, Humberto Kibel, Theodore Lauterborn,¹ and Christopher
Ottomanelli (collectively, "Defendants"). As such, I am familiar with the facts stated below and
submit this declaration to place the relevant documents on the record in further support of
Defendants' motion for Summary Judgment pursuant to Rule 56 of the Federal Rules of Civil
Procedure.²

2. Attached hereto as Exhibit A is a true and correct copy of excerpts of the
depositions of Plaintiff Terrel Haskins, taken on February 17, 2016, and June 20, 2016.

¹ Plaintiff concedes that all his claims against Theodore Lauterborn must be dismissed. See Plaintiff's
Memorandum of Law in Opposition to Defendants' Motion for Summary Judgment at 2.

² Exhibits hereto are cited within the reply papers using the designation "McLaren Reply Decl. Exh.
_____."

3. Attached hereto as Exhibit B is a true and correct copy of a Property Clerk Invoice, documenting the vouchering of three plastic containers as evidence in the arrest of Terrel Haskins on February 14, 2015.

4. Attached hereto as Exhibit C is a true and correct copy of excerpts of the deposition of Detective Essence Jackson, taken on May 12, 2016.

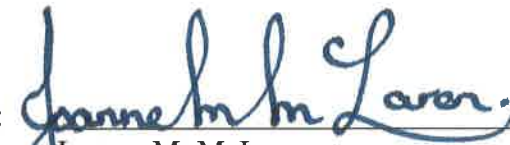
5. Attached hereto as Exhibit D is a true and correct copy of excerpts of the transcript of the deposition of Detective Humberto Kibel, taken on May 12, 2016.

6. Attached hereto as Exhibit E is a true and correct copy of excerpts of the transcript of the deposition of Sergeant Clifford Strong, taken on July 1, 2016.

Dated: New York, New York
March 15, 2017

ZACHARY W. CARTER
Corporation Counsel of the City of New York
Attorney for Defendants
100 Church Street
New York, New York 10007
(212) 356-2671

By:


Joanne M. McLaren

To: VIA ECF
Robert Marinelli
Attorney for Plaintiff